## ORLOFF, LOWENBACH, STIFELMAN & SIEGEL, P.A.

Attorneys at Law

Joel D. Siegel\*
Laurence B. Orloff\*
Stanley Schwartz\*
Jeffrey M. Garrod\*
Samuel Feldman\*
Edmund A. Mikalauskas
Susan M. Holzman\*
William J. Adelson\*
Eugenia Yudanin\*
Philip C. Corbo\*
Adam M. Haberfield
Craig A. Ollenschleger
David Gorvitz\*

44 Whippany Road - Suite 100 Morristown, New Jersey 07960 973.622.6200 • Fax: 973.622.3073

800 Third Avenue - Suite 2800 New York, New York 10022 212.220.4081

www.olss.com

July 7, 2020

Laura N. Wilensky\*
Xiao Sun\*
Devin A. Cohen\*
Alexander S. Firsichbaum\*
Samantha T. Alexander\*
Edward J. Pudup\*
Alexander B. Imel†

Of Counsel Ralph M. Lowenbach\* Floyd Shapiro Sanders M. Chattman

Frank L. Stifelman 1937-2015

\*MEMBER NJ & NY BARS
\*MEMBER NJ, NY & PA BARS

Refer To File No. 102371-001

## **BY ECF**

Marc C. Singer<sup>†</sup>

Hon. Naomi Reice Buchwald, U.S.D.J. United States District Court Southern District of New York United States Courthouse 500 Pearl Street New York, New York 10007

Re: Verano Development, Inc. v. Bolivarian Republic of Venezuela

1:20-CV-03266-NRB

Dear Judge Buchwald:

I write on behalf of the Plaintiff Verano Development, Inc. in response to Your Honor's letter to me dated July 1, 2020.

I attach hereto an affidavit of attempted service on the Defendant. As seen from the foregoing attachment, it appears that the difficulty in effecting service stems from the fact that the Consulate of Venezuela has closed. The parties' agreement provided that the Venezuelan Consul was the agent for service.

We also attempted service on the Venezuelan Ambassador to the United States but that office is also closed (see attached FedEx tracking information).

If Your Honor wishes to do so, we can effect service upon Venezuelan Ambassador to the United Nations. If Your Honor's wishes Service upon the

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Orloff, Lowenbach, Stifelman & Siegel, P.A.

Hon. Naomi Reice Buchwald, U.S.D.J. -2-

July 7, 2020

Ambassador to the United Nations by overnight mail should, more than adequately, put Venezuela on notice that this lawsuit is pending against it.

Respectfully,

/s/Samuel Feldman SAMUEL FELDMAN

SF/lam Encs.